

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address EMIL HASHTMAN 14381 RAFAEL ST. CABAZON CALIFORNIA 92230 (909) 450-9666 (909) 541-8445	FOR COURT USE ONLY <div style="text-align: center;"><div style="border: 1px solid black; padding: 5px; display: inline-block;">FILED <div style="border: 1px solid black; padding: 2px; display: inline-block;">APR 17 2020</div><div style="font-size: small; margin-top: 5px;">CLERK U.S. BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA BY: Deputy Clerk</div></div></div>
<input checked="" type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: KOSEP USA, INC.	<p>CASE NO.: 8:19-BK-14171-ES CHAPTER: SELECT CHAPTER 7</p> <p>NOTICE OF OPPOSITION AND REQUEST FOR A HEARING</p> <p>COURTROOM: 5A 411 WEST FOURTH STREET SANTA ANA CALIFORNIA 92701 Assigned to: Hon. Erithe A. Smith</p> <p>Hearing Date: 04/30/2020 AT 10:30AM</p> <p>Debtor(s).</p>

1. TO (specify name): DEBTOR, the United States Trustee & creditors and other parties in interest
2. NOTICE IS HEREBY GIVEN that EMIL HASHTMAN and EMAL HASHTMAN, a party in interest, hereby opposes the following request (specify what is opposed):
NOTICE OF MOTION FOR: ORDER: (1) APPROVING THE SALE OF THE ESTATE'S INTEREST IN KODE NOVUS I, LLC., A TEXAS LIMITED LIABILITY COMPANY, FREE AND CLEAR OF LIENS PURSUANT TO BANKRUPTCY CODE 363(b)(1) and (f) INCLUDING BREAKUP FEE, SUBJECT TO OVERBIDS, COMBINED WITH NOTICE OF BIDDING PROCEDURES AND REQUEST FOR APPROVAL OF THE BIDDING PROCEDURES UTILIZED; AND (2) GRANTING RELATED RELIEF.
3. This opposition is based upon the following grounds (specify grounds).

RULE 3002 (c)(2)(G)(B)

VITRO S.A.B. de C.V.701 F.3d 1031, 1054 (5th cir 2012)

FAIRFIELD Sentry LTD; NO 13 CIV 1524 (AKH)

THIS INTERESTED PARTY'S IS CONCERNED THAT THIS SALE MAY EFFECT ITS ASSETS IN REAL PROPERTY AT 5025 STATE STREET, MONTCLAIR CA 91762, 5025 E. STATE STREET, ONTARIO CA 91762, 5025 W STATE STREET ONTARIO CA 91762

4. Attached hereto are the following documents in support of this opposition which are admissible under the Federal Rules of Evidence (*specify declarations and exhibits by name or description*):



5. (Optional) Attached hereto is a Memorandum of Points and Authorities upon which opposing party will rely.

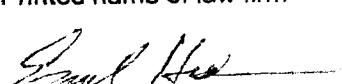
6. Total number of attached pages of supporting documentation: 0

Any reply to this opposition must be filed with the court and served on this opposing party not later than 7 days prior to the hearing on the motion.

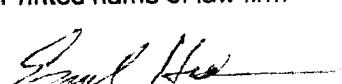
WHEREFORE, the undersigned prays that this court deny the subject request and set this matter for a hearing.

Date: 7/13/20

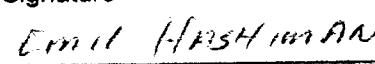
Respectfully submitted,


N/A

Printed name of law firm


Paul Hes

Signature


EMIL HESHTHMAN

Printed name

Attorney for: _____

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
14381 RAFAEL St CABAZON CA 92230

A true and correct copy of the foregoing document entitled: **Notice of Opposition and Request for a Hearing** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 4/13/20, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

U.S. Bankruptcy Court Attn: Hon. Erie Mae Smith 411 W 4th St. Suite 5040 San
Ana CA 92701

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

JAMES · Bastian - Jbastian@shulmanbastian.com Attorney for Debtor
Thomas · H Casey - MS11va2tomcasey@ms11va2.com Chapter 7 Trustee
VS Trustee (SA) USTprjgrn1b.Sa · ecf@ustdoj.gov

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/13/20 EMIL HASTHORN
Date Printed Name


Signature

KOSEP USA INC.
12966 EUCLID ST.
GARDEN GROVE CA 92840

JAMES C BASTIAN
100 SPECTRUM CTR DR STE 600
IRVINE CA 92618

CKP
2010 MAIN STREET STE 520
IRVINE CA 92614

O MELVENY & MYERS LLC
400 S HOPE ST. 18TH FLOOR
LA CA 90071

EMPLOYMENT DEVELOPMENT
PO BOX 826880
SACRAMENTO CA94280

IRS
PO BOX 7346
PHILADELPHIA PA 19101

OKLAHOMA EMPLOYMENT
SECURITY COMMISSION
P O BOX 52004
OKLAHOMA CITY OK 73152

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS A 340
PO BOX 2952
SACRAMENTO CA 95812

KOSEP CO LTD
123 SADEULRO JINJU
KYUNGSAN NAMDO
SOUTH KOREA

SEONGMAN LIM
4541LACEBARK LN
FORT WORTH TX 76244

US Trustee
411 WEST Foothill St
Santa Ana CA 92701

Olympic Renewable Platforms LLC
810 N E 6th St
Guyana OK 73942